

CTS CORPORATION

Document: General Correspondence (Marked as Exhibit OOO)
From: Stephen G. Himes, Himco Waste-Away Services, Inc.
To: Jim Zetner, CTS Corp.
 1142 West Beardsley Ave.
 Elkhart, Indiana 46514
Date: 6/19/72
Summary: Proposal for installation of a stationary compactor machine versus the removal of an average of 282 yds³ of waste from the plastics division, as they had been doing at the time of the proposal.

- Compactor & attachment drawings & a Himco brochure attached
- Fees for service, etc. discussed

Document: General Correspondence (Marked as Exhibit NNN)
From: Charles H. Himes, Jr.
 Himco Waste-Away Service, Inc.
To: CTS Corp.
Date: 11/10/72
Summary:

- Proposal for installation of 3 yd³ compactor and a 45 yd³ storage container
- Fees for Service, etc. discussed

ITEM MMM

Document: General Correspondence (Marked as Exhibit MMM)
From: James Zehendner, Purchasing Manager
Date: 11/16/72
Re: Mtg. w/ Chuck & Steve Himes
Summary:

- Accepted Himco's proposal dated 11-20-72 for service contract.

Document: General Correspondence (Marked as Exhibit LLL)
From: John Rakitan, Legal Counsel, CTS Corp.
To: Charles Himes, Himco Waste-Away Svc., Inc.
Date: 1/25/73
Summary: Letter regarding stipulation in Solid waste Removal Contract. CTS required that a subparagraph be added to paragraph 10.

Document: General Correspondence (Marked as Exhibit III-KKK)
From: Himco Waste-Away Svc., Inc.
To: CTS Corp.
Date: 8/3/73

CTS CORPORATION (Continued)

Summary: Letter outlining Himco Waste-Away Services and basic charges
· Includes copy of Solid Waste Disposal Contract

Document: General Correspondence (Marked as Exhibit SS)
Date: 12/11/75
Summary: Indiana Stream Pollution Control Board Authorization to Remove and Transport Liquid Industrial Waste.
· Operation permit No. IN 6402-0000-21
· Permit dates effective: 1/1/76 - 12/31/76
· Indiana Waste Systems, Inc., Portage, IN, allowed to remove and transport liquid waste in accordance with requirements and conditions set forth in this permit

Document: (Marked as Exhibits A,I,K,R,W,BB,HH & LL) State of Indiana Stream Pollution Control Board, SPC-17 Liquid Waste Removal Record Industry Report. For CTS of Elkhart, 1142 W. Beardsley Ave.
· Waste Description listed on each sheet

Summary:
Exhibit A: Hauling Firm: Westville Oil & Mfg, Inc., Westville, IN
Conservation Chemical, Gary, IN
Dated: 4/1/76

Exhibit I: Hauling Firm: Inland Chemical Co., Ft. Wayne, IN
Dated: 10/7/76

Exhibit K: Hauling Firm: By-Products Mgmt., Schererville, IN
Westville Oil & Mfg., Inc., Westville, IN
Van waters & Rogers, South Bend, IN
Dated: 1/6/77

Exhibit R: Hauling Firm: Westville Oil & Mfg., Inc. Westville, IN
Inland Chemical Co., South Bend, IN
Indiana Sanitation, Inc., Portage, IN
Dated: 7/1/76

Exhibit W: Hauling Firm: By-Product Mgmt. Inc, Schererville, IN
Van Waters & Rogers, South Bend, IN
Indiana Sanitation, Inc., Portage, IN
Dated: 3/28/77

Exhibit BB: Hauling Firm: Conservation Chemicals, Gary, IN
By-Product Mgmt. Inc, Schererville, IN
Westville Oil & Mfg., Inc. Westville, IN
Van Waters & Rogers, South Bend, IN
Dated: 6/24/77

Exhibit HH: Hauling Firm: Westville Oil, Westville, IN
Van Waters and Rogers, South Bend, IN

CTS CORPORATION (Continued)

Exhibit LL: Dated: 9/29/77
 Hauling Firm: C.P. Inorganics, Joliet, IL
 Chemical Recovery Systems, Romulus, MI
 Westville Oil & Mfg., Inc. Westville, IN
 Indiana Sanitation, Inc., Portage, IN
 Dated: 12/28/77

Document: General Correspondence (Marked as Exhibits B-H, J, L-Q, S-V, X-Z, AA, CC-GG, II-KK, and MM-RR)
From: CTS Chemical
Dates: 2/25/76-10/27/77
Summary: Shipping Orders from CTS Chemical
To: Westville Oil & Mfg. Inc. Indiana Sanitation, Inc.
 Inland Chemical Co. C.P. Inorganics
 Conservation Chemicals CC Supply
 Van Waters & Rogers Chemical Recovery Syst's.
 By-Products Mgmt, Inc.

Document: General Correspondence (Marked as Exhibit UU)
Date: 8/24/76
Summary: Illinois EPA Division of Land Pollution Control, Permit Section, Springfield, IL

- Application for Supplemental Permit for the Disposal of Special and/or Hazardous Wastes at an IEPA Permitted Solid Waste Management Site
- Rec'd 8/23/76, Expires 8/24/77
- Applicant: Waste Management of IL, Inc.
- Permit No: 76-468
- Name of Special Waste Hauler: Indiana Waste Systems, Inc., Portage, IN (219) 464-3506
- Name of Special Waste Generator: CTS of Elkhart, Elkhart, IN

Document: General Correspondence (Marked as Exhibit VV-XX)
Summary: Indiana Stream Pollution Control Board Authorization to Remove and Transport Liquid Industrial Waste.

- Exhibit VV: Op. Permit No. IN 0209-3040-11 For Inland Chemical Corp., Ft. Wayne, IN Dated 1/16/76, Permit effective 1/1/76-12/31/76
- Exhibit WW: Op. Permit No. IN 4602-1140-11 For Westville Oil & Mfg. Co., Westville, IN Dated 12/2/75, Permit effective 1/1/76-12/31/76.

CTS CORPORATION (Continued)

- Exhibit XX: Op. Permit No. IN 6402-000-21 For Indiana Waste Systems, Inc. Dated 12/11/76, Permit effective 1/1/76-12/31/76
- Indiana Waste Systems, Inc., Inland Chemical Corp., and Westville Oil & Mfg. Co allowed to remove and transport liquid waste in accordance with requirements and conditions set forth in this permit

Document: General Correspondence (Marked as Exhibit TT)
Date: 2/4/77
Summary: 1977 Approved License to remove and transport liquid industrial waste to Nelson Chemicals Co., 12345 Schaeffer Highway, Detroit, MI 48227

- Principal/Authorized Rep.: R. Hammerstein
- (313) 933-1500 or (313) 971-7332
- License Expires 2/28/78

Document: General Correspondence (Marked as Exhibit YY)
Date: 10/24/77
Summary: A letter from Tim Pratt indicating companies which are approved and have a valid liquid industrial waste haulers permit in the State of IN. Includes:

- By-Products Mgmt, Inc.
- C.P. Inorganics
- Chemical Recovery Syst's.
- Westville Oil & Mfg. Inc.
- Indiana Sanitation, Inc.
- Envirochem Corp.
- Conservation Chemicals
- Van Waters & Rogers

Document: General Correspondence (Marked as Exhibits ZZ,AAA-EEE, GGG-HHH)
From: Himco Waste-Away Svc., Inc.
To: CTS Corp.
Corp. Office, Plastics Div., & Main Plant
Summary: Informing CTS on 8 separate occasions in 1975, 1976, & 1977 of price increases for Himco Waste-Away Svc's.

Document: General Correspondence (Marked as Exhibit FFF)
From: Himco Waste-Away Svc., Inc.
To: CTS Corp.
Summary: Informing CTS of union employee strike
Date: Illegible

CTS CORPORATION (Continued)

Document: General Correspondence (Marked as Exhibit PPP)
From: Charles H. Himes, Jr.
Himco Waste-Away Service, Inc.
To: Cathy Cutter, CTS Corp.
Date: 10/19/79
Summary: Notified CTS that a billing error was made in favor of Himco. Documents supporting the error attached to letter.

Document: Response to Information Request Letter
From: Duane Daering, V.P., Human Resources,
CTS Corp., Corporate Offices
905 North West Blvd.
Elkhart, IN 46514
(219) 293-7511
To: Susan Swales, U.S. EPA Region V
Date: 12/13/88
Summary: Responses to 104(e) Information Request

- CTS manufactures of plastic electronic components.
- Manufacturing process includes painting, cleaning and plastic injection molding of parts. Laminating processes ceased in '85. Painting op's. generate solvent wastes (acetone & trichloroethylene). Infrequently, painting process also generates sodium hydroxide. Cleaning operations result in solvent waste, trichloroethane. Waste hydraulic oil, scrap plastics, and general plant refuse is generated also. Laminating operations generated waste resins (phenolic & G6F) and bakelite. Some painting operations prior to '85 generated waste methanol.
- Waste solvents are recovered on-site. Solvent waste that are unrecoverable are sent off-site for fuel blending, recovery, or incineration. Some paint wastes contain silver and are sent off-site for precious metal recovery. Waste sodium hydroxide is sent off-site for chemical treatment. Scrap plastic and plant refuse is sent off-site for disposal. Small quantities of unregulated waste hydraulic oil generated by the Plastics Plant are sent to the CTS Electromechanical Division Main Plant for off-site disposal. Waste resins & bakelite were sent off-site for disposal. Prior to off-site shipment, wastes are stored or accumulated in containers (drums or dumpsters) at the facility.
- CTS currently disposes of hazardous wastes disposed with the following companies:
 - Avganic Industries, Inc.
 - (Hydrite Chemical Co.)
 - Cottage Grove, WI

CTS CORPORATION (Continued)

Boliden-Metech, Inc.
Mapleville, RI

Industrial Fuels and Resources, Inc.
(Chemsohv, Inc.)
South Bend, IN

Employees responsible for making disposal arrangements are Marvin Gobles, Mgr., Plant Engineering, and John Brasseur.

Other companies which CTS contracted with for waste disposal services in the past:

A-1 Disposal Corp.
Plainwell, MI

American Chemical Svc., Inc.
Griffith, IN

Envirite
(Liqwacon Corp.)
Harvey, IL

Handy & Harman
Fairfield, CT

Reclaimed Energy Corp.
(Superior Oil Co., Inc.)
Connersville, IN

- No record of waste disposal at Himco Landfill. Records only date back to 1976, & Himco Landfill closed in 1976, so CTS doubts that records indicate anything regarding 1975 & prior. Search for relevant documents is continuing.
- CTS currently disposes of non-hazardous plant refuse with Himco Waste-Away Services, Inc.

Document:

Response to Information Request Letter

From:

Elizabeth Bottorff Ahlemann, Legal Counsel
CTS Corp., Corporate Offices

To:

Susan Swales

Date:

2/6/89

Summary:

Attempting to clear up confusion regarding EPA's belief that CTS Corp. was asserting a business confidentiality claim covering all information which CTS submitted to EPA regarding Himco landfill.

- CTS asserted a business confidentiality claim only with respect to info. provided in Exhibit B. (Exhibit B contained info. regarding CTS' liability insurance policies.)
- CTS decided to waive its claim of business confidentiality with respect to Exhibit B.

CTS CORPORATION (Continued)

Document: Supplemental Response Information Request Letter
From: Elizabeth Bottorff Ahlemann, Legal Counsel, & Jeannine Davis, V.P.,
Secretary, and General Counsel
CTS Corp., Corporate Offices
To: Susan Swales
Date: 5/9/89
Summary: Additional 104(e) letter info. regarding CTS Corp. for the time period of
January 1960 through December 1977.

- Additional info. provided because according to a 4/20/89 letter from Norm Niedergang of U.S. EPA Region V, answers provided for previous 104(e) letter were deemed "inadequate".
- The following persons were consulted in the preparation of the answers:
Marvin Gobles, Mgr., Plant Engineering
Audrey L. Van Dyke, Environmental Engineer
James Zehendner, V.P., Material Control, Electromechanical Division
Gene Wiswell, Research & Development Mgr., Electromechanical Division
John J. Brasseur, Environmental Coordinator, Electromechanical Division
- Manufacturing processes at CTS' main plant from '60-'77 include electroplating, which included silver, nickel, acid/tin, gold, and tin/lead plating, copper etching, metal punching and machining operations and the cleaning of parts.
- Raw materials used in mfg. operations at the plastics plant from '60-'77 included nylons. Laminating processes would have utilized phenolic resin, methyl alcohol, ethyl alcohol, and isopropyl alcohol.
- Raw materials used in the milling & painting processes were Carbon black, graphite, silver flake, acetone, xylene, ethyl acetate, high flash naptha, diacetone alcohol, methyl ethyl ketone, methyl isobutyl acetone, butyl carbitol acetate, alkyd resin, urea resin, melamine resin, nitrocellulose lacquer, phenolic-silicone resin, fluorocarbon resin, silicone alkyd resin, phenolic resin, silicone resin, epoxy resin. Trichloroethylene was used for cleaning and decreasing of parts.
- Waste generated: Spent trichloroethylene and still bottoms
phenolic resin, junk paints with resin, laminant scrap, scrap metals
1,1,1 Trichloroethane, liquid cupric chloride, spent ferric chloride, water soluble oil
- CTS did not use Himco Waste-Away Services, Inc. for disposal of hazardous wastes.
- No wastes were disposed of on CTS property for the time period in question.

CTS CORPORATION (Continued)

Document: General Correspondence
To: Elizabeth Bottorf Ahlemann, CTS Corp,
From:
Summary: Yellow copy of EPA letter, with sign off initials re: an asserted confidentiality claim on CTS' part.

- Dated for file 12/23/89.
- Requests additional info from CTS if confidentiality claim desired.